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Amateur Extra : N4HPG
GROL : PG38581
GMDSS Operator/Maintainer : DB852
2nd Class Radiotelegraph : T2200

Commissioners
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: **REPLY COMMENTS TO ARRL ON PSHSB 17-344**

Commissioners:

I have read the materials before the Commission on this matter and I am submitting this document as my official response to the Commission. My response will be broken down into sections:

ARRL - The National Association for Amateur Radio

I would remind the Commission that the ARRL is merely a club and also a political body with its own particular agendas. It does NOT represent all of the interest of all Amateur Radio operators in the United States and should not be construed as such. If we compare the Commissions number of licensees with the ARRL membership roles, it would be shown that they are far from being the definitive voice for all of the licensees.

In fact, the ARRL is strongly opposed on many fronts by many amateurs for its positions and tactics within the political realm. Furthermore, this organization has had internal issues that are on-going.

The point that I am making is that the Commission should NOT construe the ARRL as expressing the collective will of US Amateurs.

RACES

The Petitioner makes reference to the RACES organization and it's involvement in emergency communications. At the very heart of the petition is the concept that the petition must move forward to further enable RACES in providing essential emergency communications.

Again, I would point out to the Commission that RACES is its own organization with its own political interests and whose interests may not align with that of the majority of US Amateurs.

The Petition

The crux of the Petition before the Commission is to amend the rules to enable wide-bandwidth communications within the existing narrow-band sub-bands of the HF spectrum.

The push for wide-bandwidth transmissions goes against several decades of Commission policy that urges all services to use the minimum bandwidth necessary for the mode of communication. Indeed, we have been urged to use the narrowband transmissions on VHF and UHF systems in both commercial and Amateur bands.

The relation of bandwidth to the bit-rate of communications is well-known. Indeed, the Commission requires that this is understood for all licenses that I have listed above.

The petition flies in the face of the attempts to conserve precious bandwidth and should be discarded on this point alone - it goes against decades of Commission policy.

Emergency Communications

The Petitioner makes a case for wide-band transmissions in the narrow-band HF space in a statement of the public good. More specifically, it is meant to facilitate computer-to-computer communications by turning over narrow-band spectrum to digital modes.

I have personally been involved in emergency communications for many years. Most recently, I was the HF liaison station between Harris County, TX EOC and other county and the State EOC using HF during Harvey. I have been active in other places for other events including Hugo in 1989.

By their very nature, emergency communications are conducted under technical duress. During the Harvey incident, band conditions were so poor that it was nearly necessary to resort to CW communications.

After the hurricane in Puerto Rico, I and many others were scanning the bands trying to hear any of our fellow citizens in that devastated region. Even a low-power CW signal is better than nothing and will get across better than voice.

The point to be made here is that CW communications is still used in dire situations. The petition presumes that all stations will have computers and other support equipment when that may not be the case.

The Social Contract

There is a social contract between the Commission and the Amateur Licensees and this social contract is not found between the Commission and other services.

This contract is that we licensees will supply our OWN equipment at our OWN expense to serve the public purpose in time of need. In this way, public policy is served by private investments into radios and other equipment that the State does not provide.

In return for the license and the frequency spectrum, the Commission allows us to ENJOY the use of radio spectrum for our own fun, learning and for world-wide sharing with amateurs in other countries.

The foundation of this social contract is the bandwidth allocations by the Commission and their subdivisions to maintain orderly communications. The allocation of narrow-band transmission spectrum has been part of this social contract forever.

The Petitioner seeks to destroy the bandwidth that is presently enjoyed by a majority of operators worldwide and for a purpose that is not in keeping with the interests of the majority. At a practical level, those of us who wish to be communicating in CW will be thwarted by the presence of wide-band digital signals near us.

While this may not be a diabolical plot by the Petitioner to destroy CW communications, it is the effect. This downstream consequence may not even be fully realized by the Petitioner as she may not be a CW enthusiast despite being an Extra-class operator.

Alternatives for Digital Transmissions

There are alternative means of communication by digital modes that may be presently used or developed and which would not interfere with the rights of others. Included but not limited to various types of mesh networks and inverse-multiplexing.

The Petitioner should seek a technical remedy to her perceived problem using present technology or developing new and useful technology that may have other uses and advance the radio arts. Inverse-multiplexing would be a welcome addition to digital communications.

Summary

The means of communicating by radio using limited resources, low power levels, limited antennas, etc. is at the very heart of the entire Amateur Radio Service if it is to remain a viable service. Attempts by various parties to simply turn the spectrum over to being another Internet channel change the very nature of the platform.

If the Commission moves forward with the Petitioners request, why not abolish the Amateur Service entirely and simply create a new, commercial HF data network in its place? For this will certainly become the effect if this petition moves forward.

Therefore, I oppose the Petition for the grounds stated.

Sincerely

William G. Crowell